

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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In the Matter of:)

Revision of Filing Requirements)

CC Docket No. 96-23

**COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association (USTA) respectfully submits its reply to the comments filed April 8, 1996 in the above-referenced proceeding.

The record established in this proceeding strongly supports the Commission's proposals to eliminate certain reports. The parties agree that reducing regulatory burdens is in the public interest and should be a high Commission priority. Accordingly, the majority of commenting parties also concurred with the recommendation of USTA that the Commission eliminate the new service tracking report.¹

Only one party suggested the addition of a reporting requirement. The Competitive Telecommunications Association (CompTel) suggests that the former Bell Operating Companies (BOCs) be required to file with the Commission for public inspection copies of any billing and collection contracts they enter into with any of their affiliates. This suggestion should be summarily rejected.

¹USTA at 2, Bell Atlantic at 4, GTE at 4, Pacific Bell and Nevada Bell at 5, Southwestern Bell at 6, and Sprint at 3.


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The Commission and all the commenters, including CompTel, agree that there is no need to file a list of billing and collection contracts with the FCC. The rationale supporting the elimination of that reporting requirement also defeats CompTel's suggested new report. Billing and collection services have been deregulated since 1986 because the market for such services was found to be competitive. Competition for billing and collection has increased in the ten years following that decision. The competitive market will ensure that no entity is treated in a discriminatory manner. Further, the filing of these contracts could place the BOC affiliates at a competitive disadvantage, particularly if the prices for billing and collection services are not treated in a proprietary manner.

In a competitive environment, the imposition of additional regulation on one group of competitors is not justified. USTA urges the Commission to reject CompTel's suggestion and to eliminate the reports as discussed in USTA's comments.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

By:  _____

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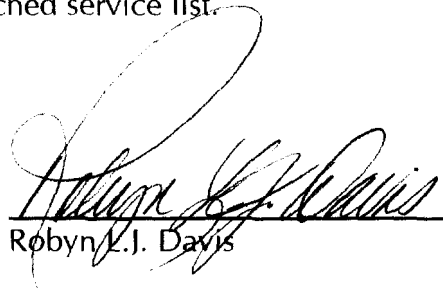
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April 23, 1996

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on April 23, 1996 comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


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